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REMARKS/ARGUMENTS

Reconsideration of the rejections set forth in the Office Action dated March 11, 2005 is respectfully requested. Claims 1-12, 14-21, and 23-26 have been rejected. Claim 27 has been added. As such, claim 1-12, 14-21, and 23-27 are currently pending.

New claim 27, which depends from claim 1, recites that a function of each general purpose block changes depending upon how the general purpose block is configured. Support for this new claim may be found in the Specification, as for example on page 5 at lines 22-25.

Rejections under 35 U.S.C. § 102 and § 103

Claims 1-6, 8, 9, 14-19, and 23 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Bjornberg et al. (US Patent No. 6,647,111), herein after "Bjornberg." Claims 1 and 15 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Johnson (US Patent No. 6,314,614) in view of Bjornberg. Claims 7, 10-12, and 21 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over by Bjornberg in view of Malik (US Patent No. 6,463,130). Claims 24-26 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Hammarström et al. (US Patent No. 6,044,142), herein after "Hammarström."

1. Claim 1 and its dependents

Independent claim 1 recites that the general-purpose blocks are configurable to at least two configurations. In one configuration, a first signal is sent without requiring input after playing a prompt. In another configuration, a second signal is sent according to input received after a prompt is played.. The configurations are *separate*

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configurations for a general purpose block.

On page 10 of the Office Action dated March 11, 2005, the Examiner makes the following statement:

> "The claim broadly recites a general-purpose block
> which is configurable to send a first signal without
> requiring input and a second input according to input
> after playing the prompt. Since the Examiner has shown
> that multiple signals can be sent from the block when the
> block is a general-purpose menu block, then the
> Examiner believes that each limitation reads on the prior
> art."

It is respectfully submitted that the Examiner has not shown that multiple signals such as the first and second signals of claim 1 can be sent from a general-purpose menu block.

Arguments Regarding Bjornberg

In the Office Action dated March 11, 2005, the Examiner has argued that Bjornberg somehow teaches the limitations of claim 1. Specifically, the Examiner has asserted on page 3 of the Office Action dated March 11, 2005 that a menu block is a general block and that a timeout_error is a first signal. The Examiner has also made an argument that a "menu selection prompt will pass the users input", and that this is somehow the same as sending a second signal according to received input after playing a prompt.

There is no teaching or suggestion in Bjornberg that Menu SIBBs are configurable to at least two configurations. More specifically, there is no teaching in Bjornberg that Menu SIBBs are configurable to one configuration that sends a first signal without requiring input and another configuration that sends a second signal based on input. At best, Bjornberg teaches of one configuration for a block which

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allows a timeout_error to be sent without requiring input. There is no teaching in Bjomberg of a second possible configuration for a block which allows a signal according to received input to be sent. First, ~~Bjornberg does not teach of more than one configuration, and does not teach that a Menu SIBB is even configurable~~. Second, ~~Bjornberg also does not teach of sending a second signal according to received input~~.

Bjornberg appears to teach of a block that can implement a menu and send a signal if an input timeout occurs. Such a block is not the general-purpose block that is recited in claim 1, as it has not been shown by the Examiner to be configurable in the two configurations that are recited in the claim.

In the passages of Bjornberg cited by the Examiner as allegedly teaching of a configuration that sends a second signal according to received input after playing a prompt, there is no teaching or remote suggestion of such a configuration, or even of sending a second signal according to received input. In the passage at lines 41-48 of column 11, Bjornberg only teaches that "control exits an Input SIBB when the expected number of digits is entered, incomplete, timeout, etc." Control exiting an Input SIBB when an expected number of digits is entered is not the same as a block sending a second signal according to received input. There is no teaching that control exiting an Input SIBB somehow involves sending any signal. In the passage at lines 30-59 of column 12, Bjornberg teaches of allowing a message to be played based on a specified condition being true or false. There is no teaching that such a condition has anything to do with an input received after a prompt is played. In the same passage, Bjornberg also mentions that an Input SIBB collects a selection from a caller. However, there is ~~no suggestion that any signal is sent~~ in response to the selection and, in fact, at lines 41-48 of column 11, Bjornberg teaches that control exits the Input SIBB after a selection is made. Therefore, as there is no teaching in Bjornberg that a signal is sent in response to any received input and, further, as there is no teaching of a block that is configurable to at least two configurations, claim 1 is believed to be allowable over Bjornberg for at least the reasons set forth.

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Claim 1 also requires that each transfer block of a plurality of transfer blocks is coupled to a general purpose block. The Examiner has cited Fig. 5 of Bjornberg as teaching of such a limitation. The Applicant is sincerely puzzled as to why the Examiner believes Fig. 5 shows each transfer block of a plurality of transfer blocks as being coupled to a general purpose block. While Bjornberg describes Fig. 5 as including a graph 504 that represents "call flow logic" (Bjornberg, column 10 at lines 10-16), such a graph does not appear to show either a general purpose block or transfer block. The Applicant is also unable to determine how Fig. 5 shows, as indicated by the Examiner on page 3 of the Office Action dated March 11, 2005, that "every menu block can have e.g. a call transfer block so that the caller can be routed to the proper destination." Bjornberg does not appear to teach of a menu block having a call transfer block. As such, claim 1 is believed to be allowable over Bjornberg for at least this additional reason.

Arguments Regarding Johnson in view of Bjornberg

The Examiner has argued that Johnson teaches of a general purpose block that is configurable to at least two configurations. The Applicant respectfully disagrees, and submit that Johnson does not teach of general purpose blocks. Johnson appears to teach of service nodes which each have multiple components (Johnson, column 2 at lines 22-37), but does not teach that service nodes are general purpose blocks that are each configurable to at least two configuration.

Assuming, purely for the sake of argument, that the service nodes of Johnson are general purpose blocks (which the Applicant does not believe to be the case), the services nodes are not described in Johnson as being configurable to one configuration that sends a first signal without requiring input and another configuration that sends a second signal according to received input. Johnson teaches that an ARU service profile includes profile items such as a user_entry_timeout and a

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user_entry_timeout_message (Johnson, column 13 at lines 4-35). Johnson also teaches that an ARU service allows caller input to be received and processed (Johnson, column 4 at lines 40-56). FIG. 1 of Johnson shows that an ARU service profile includes multiple service nodes, i.e., the profile itself does not appear to be a general purpose block or even a service node. There is no teaching or suggestion that any one of these service nodes is configurable to at least two configurations including one that sends a first signal without requiring input and another that sends a second signal according to received input. Johnson appears to suggest that each service node serves a particular function, and does not teach that any of the service nodes is configurable to at least two configurations. It is respectfully submitted that it does not appear that each services node of Johnson can be configured to different configurations.

Also, as discussed above, Bjornberg does not appear to teach the limitation that each transfer block of a plurality of transfer blocks is coupled to a general purpose block. As the Examiner has already admitted that Johnson does not teach such a limitation, Johnson does not overcome this deficiency of Bjornberg. Therefore, claim 1 is believed to be allowable over Johnson in view of Bjornberg for at least the reasons set forth.

Claims 2-12, 14, and 27 each depend either directly or indirectly from claim 1. Accordingly, claims 2-12, 14, and 27 are each believed to be allowable over the cited art for at least the reasons set forth above with respect to claim 1. Each of these dependent claims recites additional limitations which, when considered in light of claim 1, further distinguish the claimed invention over the art of record. By way of example, dependent claim 14 requires that the second signal from a first general purpose block is received by a second general purpose block. While the Examiner has argued that Fig. 7n of Bjornberg, in conjunction with Table 1 of Bjornberg, shows such a limitation, it is respectfully submitted that Bjornberg does not disclose or even suggest that the arrow indicated by "#1" in Fig. 7n is an input to another menu block. Hence, claim 14 is

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believed to be allowable over the cited art for at least this reason as well.

2. Claim 15 and its dependents

Independent claim 15 recites similar limitations to those recited in independent claim 1. Claim 15 recites specifying one of two configurations for a selected general purpose block where one configuration will send a first signal without requiring input after playing a prompt and another configuration will send a second signal according to received input after playing the prompt. Claim 15 also recites providing a plurality of transfer blocks wherein each transfer block is coupled to a general purpose block and arranged to transfer a call to a telephone number. As discussed above with respect to claim 1, none of the cited art appears to teach of such limitations. Thus, claim 15 and its dependents are believed to be allowable over the cited art for at least the reasons set forth above with respect to claim 1.

3. Claim 24 and its dependents

Claim 24 recites a method of modifying an interactive voice response system at run-time that includes modifying a configuration of a selected general-purpose block, and updating the configuration of the selected general-purpose block at run-time. The Examiner has argued that Hammarström teach of such features.

On pages 5 and 10 of the Office Action dated March 11, 2005, the Examiner asserts that Hammarström teaches of a general-purpose block that can have its configuration updated at run-time. The passage of Hammarström cited by the Examiner at lines 58-64 of column 3 as teaching of modifying a configuration and updating the configuration at run-time reads:

> "In communicating with the caller, the operator may initiate an
> action at an operator workstation that is ultimately provided to
> and executed by the intelligent network service logic. Such

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> execution typically includes executing one or more service
> independent building blocks to implement the operator-initiated
> command in the context of a service script composed of several
> service independent building blocks."

Hammarström appears to teach that an operator may <u>initiate</u> an action that is performed by service independent building blocks (SIBs), and make <u>no</u> mention of modifying a service independent building block or of updating the configuration of a service independent building block at run-time. Executing a SIB to implement an operator-initiated command in the context of a service script is <u>not</u> the same as modifying the configuration of the SIB or updating the configuration of the SIB. There is not even any suggestion that executing a SIB involves modifying or updating the SIB at run-time or otherwise.

The Examiner has argued, on page 10 of the Office Action dated March 11, 2005, that "Hammarström teaches that SIBs are used to process a call and when a customer wants additional service then an operator can modify the SIBs so that the customer requested service can be setup. Since an operator is able to modify a customer's service by using SIBs and since the network is able to initiate the service in real time then the Examiner believes that Hammarström teaches of modifying a configuration of a selected general-purpose block; and updating the configuration of the selected general-purpose block at run time." <u>The Applicant is unable to locate any passage of Hammarström which teaches what that Examiner alleges. If the Examiner could kindly point out such a passage to the Applicant, the Applicant would be most appreciative.</u>

It is noted that SIBs are taught as allowing service scripts to be designed by selecting and sequencing basic service script modules (Hammarström, column 2 at lines 2-5). However, the selection and sequencing of service script modules when the SIBs are designed or initially created is not the same as modifying a configuration of an SIB, and is not an update performed at run-time. Contrary to the Examiner's

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arguments, Hammarström does not appear to teach or even suggest that a general purpose block is modified or updated at run-time. It is unclear to the Applicant why the Examiner is of the belief that a customer's service may be modified and initiated at run-time, as Hammarström does not appear to teach that SIBs are even modified or updated. As the Applicants do not believe that Hammarström teaches the limitations of claim 24, claim 24 and its dependents are believed to be allowable.

Claims 25 and 26 depend from claim 24 and are, therefore, each believed to be allowable over Hammarström for at least the reasons set forth with respect to claim 25. Each of these dependent claims recites additional limitations which, when considered in light of claim 24, are believed to further distinguish the claimed invention over the art of record. For example, claim 25 recites that modifying a configuration includes storing a configuration parameter in a database. The Examiner has cited lines 58-67 of column 3 of Hammarström as teaching such a limitation. The passage of Hammarström cited by the Examiner at lines 58-67 of column 3 as teaching that modifying a configuration includes storing a configuration parameter in a database reads:

> "In communicating with the caller, the operator may initiate an action at an operator workstation that is ultimately provided to and executed by the intelligent network service logic. Such execution typically includes executing one or more service independent building blocks to implement the operator-initiated command in the context of a service script composed of several service independent building blocks. Significantly, the communications path established between the operator workstation and the intelligent network service logic is independent of telephony switching functions."

It does not appear that this passage even alludes to the storage of a configuration parameter in a database. The Applicant is unable to locate any disclosure in Hammarström of storing a configuration parameter in a database. As Hammarström does not appear to teach of this limitation, claim 25 is believed to be allowable for at least this additional reason.

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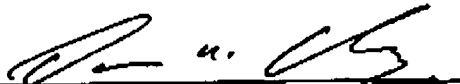
Conclusion

For at least the foregoing reasons, Applicant believes all the pending claims are in condition for allowance and should be passed to issue. If any fees are due in connection with the filing of this amendment, the Commissioner is authorized to charge such fees to Deposit Account 19-2179.

Date: _20 May 05_   Respectfully submitted,

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